

# Exhibit C

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DISTRICT**

CENTRAL STATES, SOUTHEAST AND  
SOUTHWEST AREAS PENSION FUND,  
and HOWARD McDUGALL, Trustee,

Plaintiffs,

**v.**

**MADISON ACQUISITION, LLC,**  
an Indiana limited liability company,

**Defendant.**

Case No. 08 c 0100

**Judge St. Eve**

**Magistrate Judge Nolan**

**AFFIDAVIT OF TIMOTHY REUTER**

State of Illinois )

) SS

County of Cook )

I, Timothy Reuter, having been fully sworn on oath, depose and state as follows:

1. I am an attorney employed by the Central States, Southeast and Southwest Areas Pension Fund (hereinafter referred to as the "Fund") and I am familiar with the pending litigation.

2. I have reviewed Central States billing records (attached as Exhibit 1 to this affidavit) and have determined that the work performed in connection with this case was performed by myself (TCR), and Deborah Bolden (DRB) paralegal. I was admitted to the bar of the State of Illinois on May 8, 2003.

3. I believe that a reasonable rate for the aforementioned services is \$150.00 per hour for work performed by myself. I believe a reasonable rate for the aforementioned services is \$90.00 per hour for work performed by Deborah Bolden. On that basis, the total of legal fees incurred in this matter is \$660.00 (2.9 hours x \$150.00 per hour for myself, and 2.5 hours x \$90.00 per hour for Deborah Bolden).

4. The Fund has also incurred the following costs (detailed in Exhibit 1 to this affidavit) in connection with this litigation:

Costs	\$350.00
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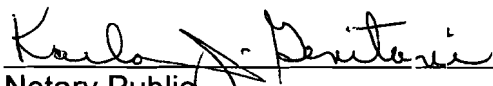
5. I believe that the aforementioned costs were necessarily incurred and are reasonable in amount.

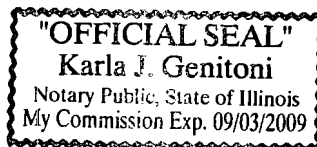
Attorney Fees	\$ 660.00
<u>Costs</u>	<u>\$ 350.00</u>
 TOTAL	 \$860.00

Further Affiant Sayeth Not.

  
Timothy C. Reuter

Subscribed and sworn to before me,  
a Notary Public, this 13<sup>th</sup>  
day of February, 2008.

  
Notary Public



# Exhibit 1

2/13/2008  
8:23 AMCentral States Funds  
Pre-bill Worksheet

Page 1

## Selection Criteria

Cont. Selection Include: 07410033

Nickname 07410033 | Madison Acquisi  
Full Name Madison Acquisition, LLC  
Address 07410033  
WLL  
2

Phone 1  
Phone 3  
In Ref To

Phone 2  
Phone 4

Date ID	Attorney Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
1/4/2008 171028	TCR Activity Prepare Complaint.	150.00	1.90	285.00	Billable
1/7/2008 171039	TCR Activity Revise Complaint and file.	150.00	0.70	105.00	Billable
1/7/2008 173012	DRB Activity Research process server information; prepare letter to process server for service of summons and complaint.	90.00	1.50	135.00	Billable
1/8/2008 173018	DRB Activity Finalize letter to process server; call process server to advise of package to be delivered i.e. summons and complaint; prepare for overnight mail.	90.00	1.00	90.00	Billable
1/11/2008 171663	TCR Activity Review notice from process server.	150.00	0.30	45.00	Billable
TOTAL	Billable Fees		5.40		\$660.00

Date ID	Attorney Expense	Price Markup %	Quantity	Amount	Total
1/7/2008 170787	TCR Expenses Complaint Filing Fee.	350.00	1.000	350.00	Billable
TOTAL	Billable Costs				\$350.00

2/13/2008  
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Central States Funds  
Pre-bill Worksheet

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07410033:Madison Acquisition, LLC (continued)

	<u>Amount</u>	<u>Total</u>
Total of Fees (Time Charges)		\$660.00
Total of Costs (Expense Charges)		\$350.00
		<hr/>
Total new charges		\$1,010.00
		<hr/>
Total New Balance		<u><u>\$1,010.00</u></u>